Isle of Man Ship Registry Technical Advisory Notice



SOLAS Electronic Log Books

Ref. TAN 011-23 Issued: 23 Nov '23

1. Introduction

This notice sets out the Isle of Man Ship Registry's requirements for SOLAS Electronic Log Books to be accepted for use onboard ships registered in the Isle of Man. Non-SOLAS electronic log books are excluded from the scope of this notice, including the Official Log Book.

In all cases, the use of Electronic Record Books remains optional and operators may continue to use paper-based systems.

2. Application

This notice applies to the following log books where an operator chooses to maintain them in an electronic format:

- GMDSS Log Book (SOLAS Chapter IV, Regulation 17)
- Navigation Log Book (SOLAS Chapter V, Regulation 28)

The standards within this notice may be voluntarily applied to other electronic log books for which there is no prescribed standard, e.g. Bridge/Engine Room Log Book.

3. Technical Standards

In order to be accepted for use onboard Isle of Man ships, the generic electronic log book system must be approved against one of the following standards by an Isle of Man RO (see MSN 020):

- ISO 21745:2019 Electronic Record Books for Ships Technical Specific and Operational Requirements
- MEPC.312(74) Guidelines for the Use of Electronic Record Books under MARPOL

For the avoidance of doubt, this notice permits MEPC.312(74) to be applied to the SOLAS log books stated in Section 2 of this notice.

In addition to the above, it will be necessary for the ship's associated hardware to comply with the following standards:

- A.813(19) Electromagnetic Compatibility for Electrical and Electronic Ship's Equipment (as amended)
- MSC/Circular.982 Guidelines on Ergonomic Criteria for Bridge Equipment and Layout (as amended)

The RO will also verify that the associated hardware complies with the relevant aspects of ISO 21745:2019.

The specific log book must, in addition, contain all the data required by the relevant convention/Regulations. These requirements can be found as follows:



Record Book	Content
GMDSS Log Book	Merchant Shipping (Radio Installations) Regulations 1999
Navigation Log Book	A.916(22) – Guidelines for the Recording of Events Related to Navigation

In the event of updates to the above requirements, ISO 21745:2019 requires that an update to the Electronic Record Book shall be completed prior to the entry into force of the relevant amendment, and that no data shall be lost as a result of the update.

In the case of the GMDSS Log Book, the requirements in regulation 30(4) of the Merchant Shipping (Radio Installations) Regulations 1999, including the requirement to open and close the GMDSS Log Book at the same time as the Official Log Book will not apply to an Electronic Record Book and a General Exemption from this requirement can be found in Appendix 1 to this notice. An operator using the Exemption must comply with the conditions in the exemption, including to maintain electronic records for a period of not less than 3 years from the date they were made and make them available for inspection onboard the ship. Records must also be provided upon request to the Ship Registry, as soon as is practicable but in any case within 3 months of the date of the request.

<u>ISO 21745:2019 – Flag State Interpretations</u>

ISO 21745:2019 requires that the output contents of the Electronic Record Book be mandated by the Flag State. For Isle of Man registered-vessels, this shall include as a minimum the ability to output the data in PDF format and for these to be printed as hard copies. PDF print outs must be signed by the Master and certified as true copies.

Where log book records are duplicated in both electronic and paper log books, whether as a result of a temporary failure of the electronic system or otherwise, the paper log book shall take precedence as the definitive record.

MEPC.312(74) – Flag State Interpretations

Please see <u>TAN 008-20</u> Sections 3 and 4 for Flag State Interpretations relating to electronic signatures, storage of data and offline records.

4. Declaration of Electronic Record Book

Once the generic system has been confirmed by the RO as meeting the standards in section 3 above, and the Electronic Record Book and any associated hardware has been installed onboard the vessel, the ship's RO must be contacted to arrange for confirmation that the system has been installed correctly on the ship, including any ship's specific items such as back-up systems.

If satisfied the system is acceptable, the ship's RO will issue a Declaration of Electronic Record Book to the ship. This Declaration must be retained onboard as evidence that the system has been accepted.

A sample form of the Declaration can be found $\underline{\text{here}}$ – its format is aligned with the same document that is required for MARPOL Electronic Log Books by MEPC.312(74).

5. Additional Considerations

In addition to Sections 3 and 4, any operator wishing to use an Electronic GMDSS or Navigation Log Book shall ensure that the following requirements are complied with, prior to commencing use of the Electronic Record Book:



- Arrangements for software updates to the Electronic Log Book should be effectively implemented under a documented system, which may be incorporated into the Safety Management System (if applicable).
- Procedures are in place for relevant seafarer's to be familiarised with the Electronic Log Book system in accordance with STCW Chapter I, Regulation 14 prior to using the system.
- The Electronic Log Book Data must be available upon request to any officer of the flag state Administration, Port State Control or any other duly authorised officer, noting that some PSC officers may request a printed PDF duly endorsed by the Master.

6. System Failure/Malfunction

In case of the failure of the Electronic Log Book System, the Ship Registry and vessel's RO shall be informed immediately and the operator shall prepare a rectification plan and contingency measures which may include reverting to a paper log book for the duration of the system failure.

Please note - The Isle of Man Ship Registry cannot give legal advice. Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular case can vary according to circumstances - for example, from vessel to vessel. You should consider seeking independent legal advice if you are unsure of your own legal position.



Appendix 1 – General Exemption

Date of Exemption: 23 November 2023

In accordance with:

Regulation 5(2) of the Merchant Shipping (Radio Installations) Regulations 1999 (SD50/99)

Exemption from:

Regulation 30(4) of the Merchant Shipping (Radio Installations) Regulations 1999

which requires

The Radio log book must be -

- (a) opened and closed at the same time as the official log book;
- (b) kept on board the ship and made available for inspection by an inspector or RO for a period of 3 years from the date of closure; and
- (c) produced to the Department upon request as soon as is practicable but in any case within 3 months of the date of the request.

is granted to any vessel to which the Merchant Shipping (Radio Installations) Regulations 1999 apply, subject to the following conditions:

The vessel has an Electronic Radio Log Book that complies with the requirements of TAN 011-23.

Electronic Radio Log Book entries are kept onboard the ship for a period of not less than 3 years from the date they were made and are available for inspection.

Electronic Log Book entries are produced to the Department upon request as soon as is practical but in any case within 3 months of the date of the request.

This exemption remains valid until revoked.

